

Section 1. Registration Information

Source Identification

Facility Name	Phibro Tech Inc , Garland Facility
Parent Company #1 Name	Phibro Animal Health Corporation
Parent Company #2 Name	

Submission and Acceptance

Submission Type	Re-submission
Subsequent RMP Submission Reason	5-year update (40 CFR 68 190(b)(1))
Description	
Receipt Date	07-Oct-2004
Postmark Date	30-Sep-2004
Next Due Date	30-Sep-2009
Completeness Check Date	18-Oct-2004
Complete RMP	Yes
De-Registration / Closed Reason	
De-Registration / Closed Reason Other Text	
De-Registered / Closed Date	
De-Registered / Closed Effective Date	
Certification Received	Yes

Facility Identification

EPA Facility Identifier	1000 0012 6794
Other EPA Systems Facility ID	TXD047823265
Facility Registry System ID	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS	784519837
Parent Company #1 DUNS	6989008
Parent Company #2 DUNS	

Facility Location Address

Street 1	1000 N first Street
Street 2	
City	Garland
State	TEXAS
ZIP	75040
ZIP4	5712
County	DALLAS

Facility Latitude and Longitude

Latitude (decimal)	32 551500
Longitude (decimal)	-096 374500
Lat/Long Method	Interpolation - Map
Lat/Long Description	Center of Facility
Horizontal Accuracy Measure	25
Horizontal Reference Datum Name	North American Datum of 1983
Source Map Scale Number	1

9721099



Owner or Operator

Operator Name	Phibro Tech Inc
Operator Phone	(201) 944-6000

Mailing Address

Operator Street 1	One Parker Plaza
Operator Street 2	
Operator City	Fort Lee
Operator State	NEW JERSEY
Operator ZIP	07024
Operator ZIP4	
Operator Foreign State or Province	
Operator Foreign ZIP	
Operator Foreign Country	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person	Gordon Mccosh
RMP Title of Person or Position	Plant Manager
RMP E-mail Address	gmccosh@phibrochem.com

Emergency Contact

Emergency Contact Name	Gordon McCosh
Emergency Contact Title	Plant Manager
Emergency Contact Phone	(972) 272-4528
Emergency Contact 24-Hour Phone	(972) 722-0812
Emergency Contact Ext or PIN	
Emergency Contact E-mail Address	gmccosh@phibrochem.com

Other Points of Contact

Facility or Parent Company E-mail Address
Facility Public Contact Phone
Facility or Parent Company WWW Homepage Address

Local Emergency Planning Committee

LEPC	Dallas County LEPC
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Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site	2
FTE Claimed as CBI	

Covered By

OSHA PSM	Yes
EPCRA 302	Yes
CAA Title V	

Air Operating Permit ID

OSHA Ranking

OSHA Star or Merit Ranking

Last Safety Inspection

Last Safety Inspection (By an External Agency) 14-May-2004
Date

Last Safety Inspection Performed By an External Agency Fire Department

Predictive Filing

Did this RMP involve predictive filing?

Preparer Information

Preparer Name

Preparer Phone

Preparer Street 1

Preparer Street 2

Preparer City

Preparer State

Preparer ZIP

Preparer ZIP4

Preparer Foreign State

Preparer Foreign Country

Preparer Foreign ZIP

Confidential Business Information (CBI)

CBI Claimed

Substantiation Provided

Unsanitized RMP Provided

Reportable Accidents

Reportable Accidents

See Section 6 Accident History below to determine
if there were any accidents reported for this RMP

Process Chemicals

Process ID

58541

Description

Anhydrous ammonia storage

Process Chemical ID

77291

Program Level

Program Level 3 process

Chemical Name

Ammonia (anhydrous)

CAS Number

7664-41-7

Quantity (lbs)

50000

CBI Claimed

Flammable/Toxic

Toxic

Process NAICS

Process ID	58541
Process NAICS ID	59894
Program Level	Program Level 3 process
NAICS Code	32518
NAICS Description	Other Basic Inorganic Chemical Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 38700

Percent Weight	
Physical State	Gas
Model Used	degadis+
Release Duration (mins)	10
Wind Speed (m/sec)	1 5
Atmospheric Stability Class	F
Topography	Urban

Passive Mitigation Considered

Dikes
 Enclosures
 Berms
 Drains
 Sumps
 Other Type

Section 3. Toxics: Alternative Release

Toxic Alter ID 45596

Percent Weight	
Physical State	Gas
Model Used	degadis+
Wind Speed (m/sec)	3 0
Atmospheric Stability Class	D
Topography	Urban

Passive Mitigation Considered

Dikes
Enclosures
Berms
Drains
Sumps
Other Type

Active Mitigation Considered

Sprinkler System	
Deluge System	
Water Curtain	
Neutralization	
Excess Flow Valve	Yes
Flares	
Scrubbers	
Emergency Shutdown	
Other Type	Two remote manual shutoffs with alarm

Section 4. Flammables: Worst Case

No records found

Section 5. Flammables: Alternative Release

No records found

Section 6. Accident History

No records found

Section 7. Program Level 3

Description

anhydrous ammonia storage

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID	49031
Chemical Name	Ammonia (anhydrous)
Flammable/Toxic	Toxic
CAS Number	7664-41-7
Process ID	58541
Description	Anhydrous ammonia storage
Prevention Program Level 3 ID	33800
NAICS Code	32518

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised)	14-May-2004
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Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update)	15-Apr-1994
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The Technique Used

What If Checklist	Yes
What If/Checklist HAZOP	Yes
Failure Mode and Effects Analysis	
Fault Tree Analysis	
Other Technique Used	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update)	01-Jun-1995

Major Hazards Identified

Toxic Release	Yes
Fire	
Explosion	
Runaway Reaction	
Polymerization	
Overpressurization	
Corrosion	
Overfilling	
Contamination	
Equipment Failure	
Loss of Cooling, Heating, Electricity, Instrument Air	

Earthquake
Floods (Flood Plain)
Tornado
Hurricanes
Other Major Hazard Identified

Process Controls in Use

Vents	
Relief Valves	Yes
Check Valves	
Scrubbers	
Flares	
Manual Shutoffs	Yes
Automatic Shutoffs	
Interlocks	
Alarms and Procedures	
Keyed Bypass	
Emergency Air Supply	
Emergency Power	
Backup Pump	
Grounding Equipment	
Inhibitor Addition	
Rupture Disks	
Excess Flow Device	Yes
Quench System	
Purge System	
None	
Other Process Control in Use	

Mitigation Systems in Use

Sprinkler System	
Dikes	
Fire Walls	
Blast Walls	
Deluge System	
Water Curtain	
Enclosure	
Neutralization	
None	Yes
Other Mitigation System in Use	

Monitoring/Detection Systems in Use

Process Area Detectors	
Perimeter Monitors	
None	Yes
Other Monitoring/Detection System in Use	

Changes Since Last PHA Update

Reduction in Chemical Inventory
Increase in Chemical Inventory
Change Process Parameters

Installation of Process Controls	Yes
Installation of Process Detection Systems	
Installation of Perimeter Monitoring Systems	
Installation of Mitigation Systems	
None Recommended	
None	
Other Changes Since Last PHA or PHA Update	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures)	11-Jun-2003
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Training

Training Revision Date (The date of the most recent review or revision of training programs)	11-Jun-2003
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The Type of Training Provided

Classroom	
On the Job	Yes
Other Training	

The Type of Competency Testing Used

Written Tests	
Oral Tests	
Demonstration	
Observation	Yes
Other Type of Competency Testing Used	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures)	11-Apr-1999
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Equipment Inspection Date (The date of the most recent equipment inspection or test)	13-Jan-2003
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Equipment Tested (Equipment most recently inspected or tested)	replaced a pipe nipple
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Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures)	01-Jan-1999
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Change Management Revision Date (The date of the most recent review or revision of management of change procedures)	01-Jan-1999
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Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review) 01-Jan-1999

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit) 01-Jan-1999

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit) 01-Jan-1999

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any))
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation)

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans) 19-Jan-2002

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures) 19-Nov-2002

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures) 01-Jan-1999

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance) 01-Jan-1999

Confidential Business Information

CBI Claimed

Section 8. Program Level 2

No records found

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?) Yes

Facility Plan (Does facility have its own written emergency response plan?) Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?) Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?) Yes

Healthcare (Does facility's ER plan include information on emergency health care?) Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan) 06-Feb-2004

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees) 06-Feb-2004

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated) American Spill Control, Inc

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated) (214) 287-7100

Subject to

OSHA Regulations at 29 CFR 1910 38
OSHA Regulations at 29 CFR 1910 120 Yes

Clean Water Regulations at 40 CFR 112
RCRA Regulations at CFR 264, 265, and 279 52 Yes

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254

State EPCRA Rules or Laws Yes

Other (Specify)

Executive Summary

INTRODUCTION

Phibro Tech Inc, is committed to the safety and well being of its employees, neighboring community, and the environment. Our products include etchants for the Printed Wire Board (PWB) industry. In the production of this product it is necessary to use anhydrous ammonia. Phibro_Tech's policy is to implement reasonable measures to prevent a release of hazardous material from occurring, to provide early detection of a release in the unlikely event that one would occur and to have in place a contingency plan to respond promptly, yet safely to such a release.

REGULATED SUBSTANCES

The Risk Management Plan has been prepared to address the handling of the following regulated substance at the Phibro-Tech Inc facility located at 1000 N First Street, Garland, Texas 75040. ANHYDROUS AMMONIA. Anhydrous ammonia is stored in a 12000 gallon (water) tank. The tank is periodically filled by experienced Anhydrous Ammonia Manufacturer's Delivery trucks as needed. Anhydrous ammonia is used in the production of fresh etchant. No repackaging takes place.

WORST CASE & ALTERNATIVE SCENARIOS

EPA has defined the Worst Case Scenario as the hypothetical rupture and full release of all contents of the facility's largest storage vessel in ten minutes, assuming all safeguards have failed, during extremely stable weather conditions. Our scenario would involve our 12,000 gallon (water) tank filled to 85%. EPA has also specified in the RMP rule that each facility must define a specific alternate or Realistic scenario that could also have off-site impact based on plant operations. The realistic scenarios are to be modeled using the actual active and passive mitigation systems that are in place if they are capable of withstanding the event that triggered the release during typical weather conditions. Our realistic scenario is the release that would occur from a rupture in the one inch schedule 80 pipe network leading from the ammonia tank. This scenario has offsite impact.

ACCIDENTAL RELEASE PREVENTION PROGRAM

Phibro-Tech Inc has a comprehensive release prevention program in accordance with the Federal RMP Prevention Program and OSHA Process Safety Management (PSM) requirements. We have in place, physical safeguards to prevent a release of anhydrous ammonia. We follow best industry practices for the design and construction of equipment, piping and instrumentation. Our process design includes pressure relief valves and excess flow valving to safeguard against overpressure and pipeline rupture and/or excessive flow.

FIVE YEAR RELEASE HISTORY

There has been no release of anhydrous ammonia prior to the original submittal date of this program.

EMERGENCY RESPONSE

Phibro-Tech has a comprehensive emergency response program that includes the installed excess flow valve and two remote shut-offs with alarm.

SAFETY IMPROVEMENTS

A security cage has been installed over the fill lines to the storage tank. The cage is kept locked. This prevents the possibility of theft or release of the anhydrous ammonia.